

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION**

In Re: Case No. 20-20748

Alexander Odongo Winder Chapter 13

Debtor. Judge James R. Ahler

OBJECTION TO AMENDED CHAPTER 13 PLAN

Greyt Estates, LLC (“Creditor”), by and through their undersigned counsel, hereby objects to the Debtor’s Amended Chapter 13 Plan filed in the above referenced case. Creditor holds a secured interest in the Real Estate located at 2437 W 21st Avenue, Gary, IN 46404. Creditor is in the process of filing a Proof of Claim which will list a secured claim amount in the approximate amount of \$33,302.98. The Chapter 13 Plan currently provides for the claim to be cram down to a value amount of \$20,000.00. Creditor believes plan undervalues the claim amount.

The Amended Chapter 13 Plan does not adequately protect the Creditor’s interest in said Property and should be denied confirmation.

Respectfully Submitted,

/s/ Molly Slutsky Simons

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CERTIFICATE OF SERVICE

I certify that on June 1, 2020, a copy of the foregoing Objection was filed electronically. Notice of this filing will be sent to the following party/parties through the Court's ECF System. Party/parties may access this filing through the Court's system:

Kevin M. Schmidt, Debtor's Counsel at courtmail@kmslawoffice.net

Paul R. Chael, Trustee at aimee@pchael13.com

Office of the U.S. Trustee at USTPRegion10.SO.ECF@usdoj.gov

I further certify that on June 1, 2020, a copy of the foregoing Objection was mailed by first-class U.S. Mail, postage prepaid and properly addressed to the following:

Alexander Odongo Winder
2437 W. 21st Avenue
Gary, IN 46404

/s/ Molly Slutsky Simons
Molly Slutsky Simons (OH 0083702)
Attorney for Creditor